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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,
 Plaintiff,
 v
 SKYRYSE, INC., ROBERT ALIN
 PILKINGTON, MISOOK KIM, and
 DOES NOS. 1-50,
 Defendants.

SKYRYSE, INC.,
 Counterclaimant,
 v
 MOOG INC.,
 Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-
 MAR

**DEFENDANTS' NOTICE OF
 MOTION AND MOTION TO
 ENFORCE ORDER
 COMPELLING TRADE SECRET
 IDENTIFICATION**

Discovery Cut-Off: April 12, 2024
 Pre-Trial Conference: August 12,
 2024; 8:30 a.m.
 Trial: August 27, 2024

Hearing: May 31, 2023
 Time: 11:00 a.m.
 Judge: Hon. Margo A. Rocconi
 Location: Courtroom 790, 7th Floor

**TO THE ABOVE-CAPTIONED COURT, AND TO ALL PARTIES
AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that at 11 a.m. on May 31, 2023, or as soon thereafter as the matter may be heard before the Honorable Judge Margo A. Rocconi in Courtroom 790 of the United States District Court, Central District of California, located at 350 West 1st Street, Los Angeles, California 90012, Defendant and Counterclaimant Skyryse, Inc. will and hereby does move to enforce the Court's Decision and Order that granted in relevant part Skyryse's motion to compel Plaintiff and Counterclaim-Defendant Moog, Inc. to provide its trade secret identification, and ordered Moog, *inter alia*, to "identify its trade secrets with a reasonable degree of precision and specificity that is particular enough as to separate the trade secret from matters of general knowledge." (Dkt. 205.)

Pursuant to Local Civil Rule 37-1, the parties conducted a conference of counsel on March 8, 2023. After the parties determined they had reached impasse, pursuant to the Honorable Judge Rocconi's discovery motion procedures, Skyryse emailed the courtroom deputy on March 8, 2023, seeking a telephone conference with the court. On March 28, 2023, the courtroom deputy emailed the parties instructing that Skyryse may file this motion without a telephonic conference.

This motion is based on this notice of motion and Skyryse's portion of the accompanying Joint Stipulation, the accompanying Declaration of Kelley M. Storey and its exhibits, the records and papers on file in this action, any material of which this Court takes judicial notice, and such other written or oral argument as may be presented at or before the time this motion is taken under submission by the Court.

1 Dated: May 9, 2023

Respectfully submitted,

2 LATHAM & WATKINS LLP

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4 By /s/ Gabriel S. Gross

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